



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

April 14, 2025

**VIA ECF**

Hon. Margaret M. Garnett  
United States District Judge  
United States District Court  
40 Foley Square  
New York, NY 10007

Re: *The New York Times Co. v. U.S. Dep't of Defense*, 24 Civ. 8266 (MMG)

Dear Judge Garnett:

This Office represents the defendant, the United States Department of Defense, in this Freedom of Information Act (FOIA) action. I write jointly with counsel for plaintiff to provide a status update, as directed by the Court's March 14 order, ECF No. 19.

As noted in our previous letters, plaintiff's complaint covers five separate FOIA requests made during 2023, which broadly relate to certain U.S. government operations in Afghanistan and Iraq from 2007 to 2015. *See* Complaint ¶¶ 8, 9, 13, 17, 23, 28. The government has completed initial searches for four of the requests, and is still completing its initial search for one request. Since the last status report, the parties have continued to discuss certain specific questions about the government's searches for records and the timing of production for responsive records that have been located. The parties have exchanged written questions and answers, and also had a detailed phone conversation earlier this month. Plaintiff is now preparing a further response based on the information the government has provided.

The parties continue to work together in good faith to seek to resolve issues without motion practice, and no party currently wishes to raise any disputes with the Court. Therefore, we respectfully propose that the parties file a further joint status report in approximately one month, or by May 13, 2025.

We thank the Court for its attention to this matter.

Respectfully submitted,

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<sup>1</sup> The Assistant U.S. Attorney (AUSA) assigned to this matter had a technological issue this evening, so another AUSA is filing this status report.